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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

SUFFERN PARTNERS LLC,

Post-Confirmation
Chapter 11
Case No. 21-22280(SHL)

Debtor.

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APPLICATION IN SUPPORT OF ENTRY OF FINAL DECREE

**TO: HONORABLE SEAN H. LANE,
UNITED STATES BANKRUPTCY JUDGE:**

The application of the above captioned reorganized debtor (the “Debtor”), by its attorneys, Davidoff Hutcher & Citron LLP, respectfully represents and sets forth as follows:

1. On or about May 16, 2021 the Debtor filed a voluntary petition for reorganization under Chapter 11 of title 11 of the United States Code, 11 U.S.C. §§101, et seq., (the “Bankruptcy Code”).
2. The Debtor was continued as a debtor-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

3. No Official Committee of Unsecured Creditors was appointed herein. No trustee or examiner has been appointed heretofore in these proceedings.

4. By Order dated October 19, 2021 (the "Confirmation Order") this Court confirmed the Debtor's Chapter 11 Plan of Liquidation dated July 21, 2021 (the "Plan").

5. §1101(2) of the Bankruptcy Code states as follows:

"substantial consummation means -

- (A) transfer of all or substantially all of the property proposed by the plan to be transferred;
- (B) assumption by the debtor or by the successor to the debtor under the plan of the business or of the management of all or substantially all of the property dealt with by the plan; and
- (C) commencement of distribution under the plan."

6. It is respectfully submitted that substantial consummation of the Plan has now occurred. Pursuant to the Plan, distributions have been completed to all allowed administrative, priority and unsecured creditors (the "Plan Distribution").

7. All other aspects of the Plan have been complied with and satisfied, including but not limited to the conclusion of all pending motions, closing of adversary proceedings, appeals, filing of a Chapter 11 closing report and payment of all administrative costs associated with confirmation and consummation of the Plan.

8. In addition, all quarterly fees pursuant to 28 U.S.C. § 1930 have been paid in full through the third quarter 2021, with the fourth quarter to be paid upon issuance of a final bill from the United States Trustee.

9. Accordingly, the Debtor respectfully requests that the Court enter a Final Decree closing the Debtor's Chapter 11 case.

10. No prior request for relief sought herein has been made to this or any other Court.

WHEREFORE, the Debtor respectfully requests the entry of a final decree closing the Debtor's Chapter 11 case, together with such other and further relief as is just under the circumstances.

Dated: White Plains, New York
December 3, 2021

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By: /s/ Robert L. Rattet
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